



June 30, 1998

VIA FEDERAL EXPRESS

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

Dear Ms. Salas:

**Re: CCD No. 92-237; In the Matter of the North American Numbering Plan,
Carrier Identification Codes (CICs)**

Enclosed for filing in the above captioned matter are an original and four (4) copies of a Petition of Jefferson Telephone Company, Inc., for Extension of Time Granted in Prior Waiver. We trust that the enclosed will be found in order for filing and grant. We have also enclosed one copy to be stamped and returned in the enclosed self-addressed stamped envelope.

Should you require any further information, or have any questions regarding this filing, please call me at (719) 594-5828.

Sincerely,

A handwritten signature in cursive script that reads "Leslie Christina Pilgrim".

Leslie Christina Pilgrim
Consultant

Enclosures

cc: Service List

No. of Copies rec'd
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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)

Administration of the)
North American Numbering Plan,)
Carrier Identification Codes (CICs))

CC Docket No. 92-237

**PETITION OF JEFFERSON TELEPHONE COMPANY, INC. FOR EXTENSION OF
TIME GRANTED IN PRIOR WAIVER**

I. Introduction

Jefferson Telephone Company, Inc., (hereafter "Jefferson"), by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests an extension of its temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

In compliance with paragraph 24 of the FCC's Order on Reconsideration, Jefferson sought relief of the FCC's conversion deadline of January 1, 1998. Rather than grant the petition the FCC deemed the petition moot, because Jefferson was not providing equal access at that

time.¹ Jefferson would like to clarify that at the time of the original petition, it was in the last stages of implementing equal access and was complete with that process by December 31, 1997. Based on equal access now being implemented, Jefferson is in a position whereby it will not be four-digit CIC capable by June 30, 1998. As a result of implementing equal access it was discovered that the generic switch would need to be replaced. Jefferson will identify these special circumstances that warrant a deviation from the Order and show that a waiver will serve the public interest. Also, Jefferson will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

II. Background

Jefferson Telephone Company is a rural local exchange carrier in Jefferson, South Dakota. Jefferson provisions services for approximately 550 access lines, 4 payphone and no hotel/motel lines. The exchange was served by a Nortel DMS 10 with the software generic 403.31, prior to the acquisition.

Jefferson discussed with Nortel whether or not the existing software generic would be capable of four-digit CIC shortly after the FCC released its Second Report and Order. At the time, Jefferson was informed that the current generic would be capable of the four-digit CIC. Subsequently, when Nortel technicians began changing translations in the switch in preparation for the conversion to equal access, it was determined that an upgrade to the switch would be necessary to implement the four-digit CIC.

¹ *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File NOS. 97-53; 97-56; 97-46; 97-51; 97-54; 97-55; 97-47; 97-48; 97-49; 97-50; Order, DA 97-2528, rel. December 3, 1997.

During this same time, Jefferson was in the process of being sold. The company requested that the South Dakota PUC approve a December 31, 1997 transfer date. As disclosed in the pertinent PUC filing, the buyer intended to install a remote switch in the exchange and use its own DMS 100 switch as a host switch to perform all switching functions. The buyer anticipated that the remote switch installation would be accompanied within six months of closing on the sale of Jefferson.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

Based on the findings of Nortel, in order to comply with the FCC's order, Jefferson requires, at minimum, an upgrade to the switch to the latest generic software level. Since the original petition, the acquisition of Jefferson has been completed and the buyer has started installation of the new remote switch, with a software generic that will accommodate the four-digit CIC.

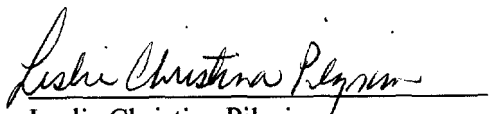
The hardware portion of Jefferson's new switch has been installed by Nortel. However, the conversion of numbers into the database has not been completed. The conversion has not been completed due to a miscommunication between the company and Nortel, as to who would be responsible to complete the conversion. In addition, Jefferson's employee responsible for database conversions and translations has separated from the company. Jefferson has reached, through verbal negotiations, a commitment from Nortel to complete the conversion. The scheduled completion date is August 26, 1998. However, Jefferson feels a few days of additional testing will be necessary to ensure four-digit capability.


Jefferson believes this waiver is necessary to avoid complaints that may be filed against them, now that it has converted to equal access and will not be four-digit CIC capable by June

30,1998. Jefferson believes by granting this waiver the impact to its customers will be minimal. Jefferson is making a concerted effort to comply with all of the FCC requirements and meet its customer needs. It is taking the necessary steps to ensure that the regulatory requirements and customer needs will be met. Jefferson submits that grant of this petition will serve in the best interest of the public. Based on the aforementioned information, Jefferson requests the petition be granted until August 31, 1998.

IV. Conclusion

Jefferson is actively pursuing a remedy to meet the FCC's requirement. Grant of this petition for extension will serve the public interest and will allow Jefferson to complete its switch replacement and meet the FCC's CIC/CAC requirements. Jefferson submits that the public interest will be better served by an extension of the waiver and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, Jefferson Telephone Company, Inc., respectfully requests the Commission grant the petition.


Leslie Christina Pilgrim
Consultant, GVNW Inc./Management


Date

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VIA FACSIMILE

AFFIDAVIT

STATE OF SOUTH DAKOTA)
COUNTY OF UNION)

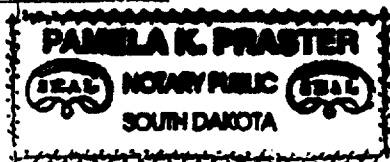
Paul Bergmann, Jefferson Telephone Company, Inc., first being duly sworn, on his oath states:

1. that he has participated in the preparation of the foregoing petition,
2. that he deems it an operational necessity to replace the current switch or to upgrade the software generic,
3. that for reasons stated therein deem it is in the public's best interest to replace the switch in order to comply with the FCC's mandate,
4. and that the information contained therein are true to the best of his knowledge and belief.

Paul Bergmann
Vice President - Operations

Subscribed and sworn to before me this 30th day of

June 1998.



Pamela K. Plaster
Notary Public

My commission expires

August 26, 2004